

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

GENERAL MOTORS LLC IGNITION SWITCH LITIGATION

14-MD-2543 (JMF)

*This Document Relates to All Actions*

Hon. Jesse M. Furman

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**NEW GM'S MOTION *IN LIMINE* NO. 5**

**MOTION *IN LIMINE* TO EXCLUDE EVIDENCE AND ARGUMENT RELATING TO  
(i) THE TOTAL NUMBER OF CASES FILED AGAINST NEW GM AND (ii) PRIOR  
INDIVIDUAL CASE SETTLEMENTS, NEGOTIATIONS, AND  
POTENTIAL SETTLEMENTS**

General Motors LLC ("New GM") hereby moves for an order granting New GM's request for the exclusion of evidence, argument, or reference to evidence relating to (1) the total number of cases filed against New GM; and/or (2) prior settlements, negotiations, and/or potential settlements between New GM and third parties related to other ignition switch personal injury claims and suits. New GM's Motion is further supported by New GM's Memorandum of Law in Support of its Motion *In Limine* To Exclude Evidence and Argument Relating to (i) the Total Number of Cases Filed Against New GM and (ii) Prior Individual Case Settlements, Negotiations, and Potential Settlements, which is fully incorporated by reference herein.

Dated: October 30, 2015

Respectfully submitted,

/s/ Richard C. Godfrey, P.C.

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 30, 2015, I electronically filed the foregoing pleading using the CM/ECF system which will serve notification of such filing to the email of all counsel of record in this action.

By: /s/ Andrew B. Bloomer

Andrew B. Bloomer, P.C.